

Application No. 10/654,783

Remarks

Applicants thank the Examiner for his careful consideration of the application.

Claims 1, 4-8, 10-14, 16, 17, 20, and 21 stand rejected.

Claim Rejections – 35 USC § 102

The Examiner rejected claims 1, 4-8, 10-14, 16, 17, 20, and 21 under 35 USC § 102(b) as being anticipated by Sato (Japan 2-126281). Claims 17, 20, and 21 have been canceled. The remaining rejections are respectfully traversed.

In claim 1, Applicants recite that the backing members of a photoreceptor module are retractable such that the tension roller extends and deforms the shape of a belt enough to ease the movement of the module between surrounding modules.

In claim 8, Applicants recite a method for detensioning a photoreceptor belt including the step of simultaneously retracting multiple backing members located on a photoreceptor module, wherein a tension roller extends and deforms the shape of the belt when the backing members are retracted.

In claim 12, Applicants recite a method for servicing a photoreceptor module having a photoreceptor belt, a tension roller, and multiple backing members, including simultaneously retracting at least some of the multiple backing members such that the tension roller extends and deforms the shape of the belt.

Claims 1, 8, and 12 should be allowed as the Examiner has not established that Sato anticipates any of these claims. To establish anticipation, the prior art reference must include each and every element of the claim. The Examiner has not shown where Sato discloses that the backing members of a photoreceptor module are retractable or retracted such that the tension roller deforms the shape of a belt. The Examiner recites that Sato discloses back-up rollers 27 of Sato that correspond to Applicants' retractable backing members 40, 42, 44 and a roller 49 of Sato corresponding to Applicants' tension roller 26C. The Examiner also goes on to state that turning knob 39 backing members 27 and roller 49 in Sato. This is not what Applicants' recite. Applicants' use a lever to retract backing members 40, 42, 44. However, Tension roller 26C is not retracted and actually extends out further when the backing members 40, 42, 44 are retracted. Applicants claim that the

Application No. 10/654,783

backing members are retractable (or retracted) such that the tension roller deforms the shape of the belt. How can the tension roller deform the belt if it is retracted? Therefore, the Examiner has not shown that Sato anticipates any of claims 1, 8, and 12 and claims 1, 8, and 12 should be allowed.

Claims 4 – 7 should be allowed if claim 1 is allowed as claims 4 – 7 depend from claim 1.

Claims 10 and 11 should be allowed if claim 8 is allowed as claims 10 and 11 depend from claim 8.

Claims 13, 14, and 16 should be allowed if claim 12 is allowed as claims 13, 14, and 16 depend from claim 12.

The Examiner rejected claims 8, 12, 13 and 16 under 35 USC § 102(e) as being anticipated by Hamada et al (U.S. 6,731,895). These rejections are respectfully traversed.

Claims 8 and 12 should be allowed as the Examiner has not established that Hamada anticipates any of these claims. To establish anticipation, the prior art reference must include each and every element of the claim. Specifically, the Examiner has not shown simultaneously retracting multiple backing members located on a photoreceptor module such that a tension roller extends and deforms the shape of the belt when the backing members are retracted. The Examiner asserts to elements 15a and 15b correspond to retractable backing members. First, neither member 15a or member 15b appear to contact the intermediate transfer belt 16. Therefore, they do not qualify as backing members. Backing members would have to contact the belt or they would not be backing members. Second, members 15a and 15b are fully extended when rollers 13 and 14 provide the most tension (and therefore the most deformation) on the belt 16. When the members 15a and 15b are "retracted" by pivoting about 15c, rollers 13 and 14 deform the belt less, not more. The Examiner has not shown how simultaneously retracting 15a and 15b would lead to either roller 13 or roller 14 providing greater deformation to the belt. For the foregoing reasons, claims 8 and 12 should be allowed.

Claims 13 and 16 should be allowed if claim 12 is allowed as claims 13 and 16 depend from claim 12.

Application No. 10/654,783

Claim Rejections – 35 USC § 103

The Examiner rejected claims 10, 11, and 14 are rejected under 35 USC § 103(a) as being unpatentable over Hamada et al (U.S. 6,731,895) in view of Sato (Japan 2-126281). These rejections are respectfully traversed.

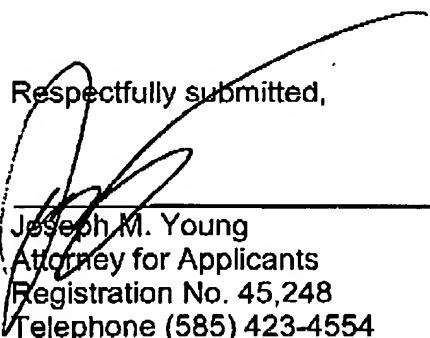
To establish a prima facie case of obviousness the Examiner has to find all the limitations of Applicants' claimed invention in the references or in the prior art generally. Applicant has previously argued that the Examiner has failed to establish that either Sato or Hamada discloses retracting backing members such that a tension roller deforms a photoreceptor belt. Claims 10, 11, and 14 each contain the limitation that the backing members retract so that a tension roller can extend and deform a photoreceptor belt. Therefore, as the Examiner has failed to point to this limitation in the prior art, the Examiner has failed to establish a prima facie case of obviousness with respect to these claims.

Conclusion

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

A telephone interview is respectfully requested at the number listed below prior to any further Office Action, i.e., if the Examiner has any remaining questions or issues to address after this paper. The undersigned will be happy to discuss any further Examiner-proposed amendments as may be appropriate.

Respectfully submitted,


Joseph M. Young
Attorney for Applicants
Registration No. 45,248
Telephone (585) 423-4554

JMY/gmm